

## **CUSHNER & ASSOCIATES, P.C.**

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Todd S. Cushner\*\*  
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September 14, 2019

**VIA ECF**

Honorable Sean H. Lane  
United States Bankruptcy Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**Re:** In re: Lotus N. Gates, Chapter 13 Case No. 16-23721(SHL)  
Case Status Report – Motion to Dismiss on September 23, 2020

Dear Judge Lane:

The law firm of Cushner & Associates, P.C. represents the debtor Lotus N. Gates (the “Debtor”) in the above referenced matter.

On July 10, 2020 the Chapter 13 Trustee filed a Motion to Dismiss with the hearing scheduled on July 29, 2020. At the hearing the Chapter 13 Trustee addressed that the debtor had defaulted under the terms of the plan in the amount of \$12,420.

Upon information and belief, the Debtor has become current with the defaulted amount of \$12,420 stated under the terms of the plan. (see attached confirmation of same). The Debtor respectfully requests the Motion to Dismiss be withdrawn. Thank you for your attention to this matter.

Respectfully yours,

/s/ Todd S. Cushner  
Todd S. Cushner, Esq.  
*Attorney for the Debtor*



## Case Number 1623721

### Debtor Information

Debtor 1 LOTUS GATES

Debtor 2

### Trustee Information

Trustee Krista M. Preuss

#### Status

Data Last Updated Sep 10, 2020

Total Paid into Plan \$109,829.00

Petition Filed on Dec 15, 2016

#### Debtor's Latest

##### Payments

CASHIER CHECK 6893 \$2,827.00 08/17/2020

CASHIER CHECK 2262 \$2,920.00 07/28/2020

CASHIER CHECK 2243 \$10,000.00 07/21/2020

#### CASE INFORMATION

Case Number	1623721	Filing Fee in Plan	\$0.00
Case Status	ACTIVE	Filing Fee Paid to Date	\$0.00
NDC Case Status	Active-Open	Date Petition Filed	12/15/2016
Last Receipt Date	08/17/2020	Date Plan Filed	
Last Receipt Amount	\$2,827.00	First 341 Meeting Date	02/10/2017
Last Disbursement Date	08/31/2020	Date Case Confirmed	07/04/2018
Total Paid into Plan	\$109,829.00	Date Case Closed	
Total Paid to all Parties	\$109,829.00		
Total Paid to Creditors	\$101,152.02		
Proposed Length Of Plan			

#### TRUSTEE INFORMATION

Trustee Name Krista M. Preuss  
Trustee City White Plains, NY  
Amount Paid to Date \$5,702.12

#### JUDGE/ATTORNEY INFORMATION

Judge Name Sean H. Lane  
Court District  
Court Division  
Region  
Attorney Name CUSHNER & ASSOCIATES, P.C.  
Attorney Phone 9146005502  
Attorney Fee in Plan \$7,722.95  
Attorney Paid to Date \$7,722.95  
Attorney Fee Paid Outside Plan \$0.00

#### DEBTOR INFORMATION

Debtor 1	Debtor 2
Debtor Name LOTUS GATES	Debtor Name
AKA	AKA
DBA	DBA

Payroll  
Deduction  
Amt

Payroll  
Deduction  
Amt

Payroll  
Deduction  
Frequency

Payroll  
Deduction  
Frequency

PLAN STEPS

COURT DOCKET

START DATE	END DATE	NUMBER OF PAY PERIODS	PAYMENT AMOUNT	PAYMENT FREQUENCY
01/2017	11/2017	11	\$1,715.00	MONTHLY
12/2017			\$2,827.00	MONTHLY